

# **EXHIBIT 4**

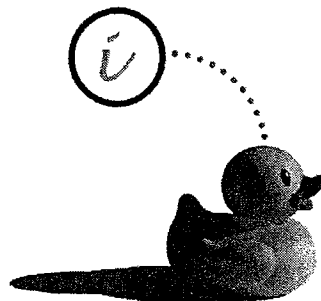


**Damages in Brady et al vs.  
The Air Line Pilots Association**

**Supplementary Report on Damages Under the  
Tannen List**

Rikk M.T. Salamat, BA, MBA  
Principal Consultant, Case Lab Inc.

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**Think Information**

<b>Tannen List</b>
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In Patrick Brady et al v. Air Line Pilots Association (ALPA), the jury found that ALPA violated its duty of fair representation to the former pilots of Trans World Air (TWA) and that this violation caused injury to the TWA pilots. This report concerns the calculation of those damages under a list which I will refer to as the "Farber List."

The Tannen List, also known as the Rightful Place Proposal, is a seniority lists that merges the pilots of American Airlines and TWA who were active at the time those two companies merged. This list was provided to me in electronic format and is included as Tannen Appendix 1. In order to harmonize the lists with other seniority lists from later periods, several pilots had to be dropped, others were inserted above the pilot junior to them on later lists, and pilots' employee IDs were changed to ones used by the modelling software. The resulting list is included as Tannen Appendix 2. No other modifications to the lists provided were made.

In my report *Damages in Brady et al v. The Air Line Pilots Association* dated October 12, 2012, I outlined the methodology which was used for analyzing the damages in this matter. Those calculations were performed on a number of different lists using the same assumptions. I have also run the Tannen List in the same manner as those lists. Figure 1 below summarizes the results of those calculations and any descriptive comments in that other report apply to these results. The damages to individual pilots under each list are in Tannen Appendix 3 and all intermediate calculations and inputs are included in the data files in Appendix 16 of my main report.

Figure 2 plots the damage to each TWA pilot under the Tannen List according to each pilot's TWA seniority number in April 2001.

Figure 1

	Figures in \$M
	Tannen
	Seniority
	List
April 2002 - June 2012	
Employment Damages	(213.4)
Interest	(35.9)
Subtotal	(249.3)
Furlough Damages	(664.3)
Interest	(111.7)
Subtotal	(776.0)
Subtotal	(1,025.3)
July 2012 - June 2026	
Employment Damages	(300.1)
PV Discount	37.1
Subtotal	(263.0)
Pension	
Plan A Damages	(130.9)
Plan B Damages	(293.5)
Total	(424.4)
Total Damages	(1,712.7)

Figure 2

